

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

MARK HALE, TODD SHADLE, and
LAURIE LOGER, on behalf of themselves and
all others similarly situated,

Plaintiffs

v.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, EDWARD
MURNANE, and WILLIAM G. SHEPHERD,

Defendants.

Case No. 3:12-cv-00660-DRH-SCW

Judge David R. Herndon

Magistrate Judge Stephen C. Williams

**DECLARATION OF ROBERT A. CLIFFORD IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Robert A. Clifford, am a member in good standing of the State Bar of Illinois and a partner in the law firm of Clifford Law Offices PC ("CLO"). I am the Court-appointed Co-Lead Counsel for Plaintiffs in the above-captioned action. I provide this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Costs.

1. I have reviewed the time and expense records submitted by CLO in this litigation and attest that they are accurate.

2. I further attest that the billing rates used to calculate the lodestar reflect the customary billing rates of the timekeepers at the time the services were rendered.

3. A true and correct copy of CLO's resume is attached as Attachment A to this Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 15, 2018, in Chicago
Illinois



Robert A. Clifford
Clifford Law Offices, P.C.

EXHIBIT A

CLIFFORD LAW OFFICES
Firm Biography

Clifford Law Offices, a Chicago-based boutique litigation firm, has emerged as a leader in obtaining substantial verdicts and settlements on behalf of its clients since its inception 34 years ago. The firm, now expanded to 22 lawyers, has worked to establish a national reputation, and is consistently named by the National Law Journal as one of the Top 10 Litigation Boutiques in the country, as well as topping the U.S. News/Best Lawyers in America list as among the best in several areas of law including Commercial Litigation; Bet-the-Company Litigation; Personal Injury Litigation – Plaintiffs; Mass Tort Litigation / Class Actions – Plaintiffs; Product Liability Litigation – Plaintiffs; and Qui Tam Law. The Chicago Lawyer has annually named Clifford Law Offices one of the city's top firms in its Annual Settlement Survey. The firm's success is dependent on the expertise and acumen of its partners, six of whom have earned an AV preeminent rating from Martindale-Hubbell, the highest rating available. Its lawyers together represent hundreds of years of experience in litigation.

Since expanding its personal injury and wrongful death concentration to include class actions and multi-district litigation in the past decade, the firm has negotiated several significant settlements including the \$1.2 billion settlement of numerous property damage claims following the collapse of the Twin Towers in New York following the tragedy of Sept. 11. (*In Re: September 11th Litigation*, 21 MC 101). Other class action litigation handled by the firm includes *In Re: Herbal Supplements, Marketing and Sales Practices Litigation*, 1:15-cv-05070, where founder and senior partner Robert A. Clifford serves as co-lead counsel. Mr. Clifford also is lead counsel in the multi-million-dollar settlement involving Pella Windows. *Eubank, et al. v. Pella Corp.*, 1:06-cv-04481. The firm's consumer and class action practice group is led by partner, Shannon McNulty, and also includes securities litigation (*In re: Dealer Management System Antitrust Litigation*, C.A. No. 18-C-864, MDL No. 2817 (N.D. Ill.)), athletic concussion litigation against the NCAA (liaison counsel in *In Re: National Collegiate Athletic Association Student - Athlete Concussion Litigation*) and artificial hip litigation against DePuy (*Bulwa, et al v. DePuy Orthopaedics, Inc., et al*, 2012 L 9209), to name but a few.

The practice groups of Clifford Law Offices also include consumer fraud, financial and insurance fraud, data protection, digital privacy, False Claims Act actions and whistleblower litigation. Its experience involves non-U.S. litigation in countries including England, China, Japan and China. Its foreign clients, both public and private come from as far away as the U.K., Europe, Mexico, Hungary, Amsterdam and Mexico. The firm has frequently partnered with U.K. barristers and European counsel in its international practice.

The firm and its lawyers have been recognized for its many accomplishments and its active participation in lawyer groups throughout the country. For example, Mr. Clifford serves on the Board of Overseers of the Rand Institute for Civil Justice, a California-based think tank. The firm endowed DePaul University School of Law with its first chair in Tort Law and Social Policy that has conducted a free two-day symposium for the past 25 years on a timely topic dealing with the relationship between tort law and societal needs. The firm was the first to sponsor closed captioning on locally produced programming at WTTW, Chicago's public television station, more than 10 years ago. Its lawyers have served in leadership positions, including presidencies of local bar associations. Mr. Clifford has consistently ranked among the Top 100 Most Powerful Chicagoans and was recognized for his civility and ethics in receiving the Professionalism Award from the U.S. Court of Appeals for the Seventh Circuit as well as the Justice John Paul Stevens Award from the Chicago Bar Association, its highest honor. The firm has supported many community activities including Lawyers Lend-A-Hand to Youth, the Mexico-Puerto Rico Hurricane Relief fund, the Naples Children and Education Foundation and the DePaul University College of Law Center for Public Interest Law.

The philosophy of Clifford Law Offices is based upon a dedication to protecting and preserving the dignity and rights of all individuals.